

**FILED UNDER SEAL PURSUANT TO  
PROTECTIVE ORDER**

**Exhibit J**

to the Declaration of Dat Nguyen in Support of  
KAIFI's Motion for Leave to Amend  
Infringement Contentions

**From:** Chris Bunt <[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)>

**Sent:** Monday, March 1, 2021 3:37 PM

**To:** Kremer, Paul J. <[PKremer@gibsondunn.com](mailto:PKremer@gibsondunn.com)>; Sheasby, Jason <[JSheasby@irell.com](mailto:JSheasby@irell.com)>; Tom Gorham <[tom@gillamsmithlaw.com](mailto:tom@gillamsmithlaw.com)>; Melissa Smith <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>

**Cc:** Nicole<[gillamsmithlaw.com](mailto:Nicole@gillamsmithlaw.com)>; Curtis, Nathan R. <[NCurtis@gibsondunn.com](mailto:NCurtis@gibsondunn.com)>; Deana Attaway <[dattaway@pbatyler.com](mailto:dattaway@pbatyler.com)>; Dat Nguyen <[dat.nguyen@ltlattorneys.com](mailto:dat.nguyen@ltlattorneys.com)>; Enoch Liang <[Enoch.Liang@ltlattorneys.com](mailto:Enoch.Liang@ltlattorneys.com)>; Michael Song <[michael.song@ltlattorneys.com](mailto:michael.song@ltlattorneys.com)>; LTL-Kaifi-T-Mobile <[LTL-Kaifi-T-Mobile@ltlattorneys.com](mailto:LTL-Kaifi-T-Mobile@ltlattorneys.com)>; \*\*\* TMUS-Kaifi\_C <[TMUS-Kaifi\\_C@gibsondunn.com](mailto:TMUS-Kaifi_C@gibsondunn.com)>

**Subject:** RE: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

Paul,

I emailed asking for TM's position a week ago. You have had our second supplemental contentions for more than a week. You noted in your motion to strike that we should not be allowed to supplement. We have now shared a draft of our motion for leave with you explaining precisely why we are entitled to supplement. You and Jason spoke today about the motion for leave. There is no requirement for lead and local counsel to participate in a meet and confer on such a motion. There is no reason to delay this further. It is obvious you are opposed. If you feel like some meet and confer obligation has been violated, you may certainly note it in your response.

CB

**From:** Kremer, Paul J. <[PKremer@gibsondunn.com](mailto:PKremer@gibsondunn.com)>

**Sent:** Monday, March 1, 2021 5:25 PM

**To:** Sheasby, Jason <[JSheasby@irell.com](mailto:JSheasby@irell.com)>; Chris Bunt <[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)>; Tom Gorham <[tom@gillamsmithlaw.com](mailto:tom@gillamsmithlaw.com)>; [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

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**Subject:** RE: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

Jason,

Your 5:11 pm EST email below, like your last one, is inaccurate. For example, I never that said T-Mobile had not reviewed the contentions; in fact, our team has been reviewing KAIFI's extensive second round of proposed supplements, and we identified issues with those supplements. In response, you called me today and demanded that I personally propose a "compromise" on the spot that would allow KAIFI to serve the contentions. Your call, and the inaccurate e-mails that followed, were neither productive nor professional. T-Mobile is willing to meet and confer as soon as the necessary participants are available to do so on these issues. The parties have not yet had a substantive meet and confer on these issues, as required, and any motion filed absent such a meet and confer would violate the Court's rules.

Best regards,

**Paul J. Kremer**  
(he / him / his)

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**From:** Sheasby, Jason <[JSheasby@irell.com](mailto:JSheasby@irell.com)>  
**Sent:** Monday, March 1, 2021 5:16 PM  
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**Subject:** Re: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

[External Email]  
Please respond by 8PM PT.

Thanks  
JS

From: Jason Sheasby <[JSheasby@irell.com](mailto:JSheasby@irell.com)>  
Date: Monday, March 1, 2021 at 2:11 PM  
To: "Kremer, Paul J." <[PKremer@gibsondunn.com](mailto:PKremer@gibsondunn.com)>, Robert ~Bunt <[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)>, Tom Gorham <[tom@gillamsmithlaw.com](mailto:tom@gillamsmithlaw.com)>, Melissa ~Smith <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>  
Cc: "~Winningham, Nicole" <[nicole@gillamsmithlaw.com](mailto:nicole@gillamsmithlaw.com)>, "Curtis, Nathan R." <[NCurtis@gibsondunn.com](mailto:NCurtis@gibsondunn.com)>, Deana Attaway <[dattaway@pbatyler.com](mailto:dattaway@pbatyler.com)>, Dat Nguyen <[dat.nguyen@ltlattorneys.com](mailto:dat.nguyen@ltlattorneys.com)>, Enoch Liang <[Enoch.Liang@ltlattorneys.com](mailto:Enoch.Liang@ltlattorneys.com)>, Michael Song <[michael.song@ltlattorneys.com](mailto:michael.song@ltlattorneys.com)>, "[LTL-Kaifi-T-Mobile@ltlattorneys.com](mailto:LTL-Kaifi-T-Mobile@ltlattorneys.com)" <[LTL-Kaifi-T-Mobile@ltlattorneys.com](mailto:LTL-Kaifi-T-Mobile@ltlattorneys.com)>, \*\*\* TMUS-Kaifi\_C <[TMUS-Kaifi\\_C@gibsondunn.com](mailto:TMUS-Kaifi_C@gibsondunn.com)>  
Subject: Re: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

Paul:

There was nothing inaccurate in my email. You confirmed that you had not even read the contentions despite writing an email asserting that they were improper and presented new theories. You did not say you needed any additional explanation from us. You stated that you would have a definitive answer for me today.

You have already indicated an opposition to the first supplement. The second supplement incorporates all of the first supplement. As a result, we will be filing the motion this evening

opposed.

Attached is a draft of the motion. We will file at 8PM PT.

JS

From: "Kremer, Paul J." <[PKremer@gibsondunn.com](mailto:PKremer@gibsondunn.com)>

Date: Monday, March 1, 2021 at 2:01 PM

To: Jason Sheasby <[JSheasby@irell.com](mailto:JSheasby@irell.com)>, Robert ~Bunt <[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)>, Tom Gorham <[tom@gillamsmithlaw.com](mailto:tom@gillamsmithlaw.com)>, Melissa ~Smith <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>

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Subject: RE: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

Jason,

Your characterization of our call is not accurate. In any event, we would be prepared to meet and confer regarding your proposed supplementations at a time convenient for the necessary participants. When we do, please be prepared to provide an explanation as to the basis and justification for KAIFI's second round of supplemental contentions.

Best,

Paul J. Kremer  
(he / him / his)

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From: Sheasby, Jason <[JSheasby@irell.com](mailto:JSheasby@irell.com)>

Sent: Monday, March 1, 2021 3:10 PM

To: Kremer, Paul J. <[PKremer@gibsondunn.com](mailto:PKremer@gibsondunn.com)>; ~Bunt, Robert <[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)>; Tom Gorham <[tom@gillamsmithlaw.com](mailto:tom@gillamsmithlaw.com)>; [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

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Subject: Re: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-

Mobile

[External Email]

Dear Paul:

Thank you for speaking with me. I asked you if there was any compromise we could reach. You declined to answer claiming that you had not even read the Second Proposed Supplement. I told you that I thought this behavior was inappropriate. You agreed to give us your final position by the end of the day so that we can get the motion on file.

Thanks

From: "Kremer, Paul J." <[PKremer@gibsondunn.com](mailto:PKremer@gibsondunn.com)<<mailto:PKremer@gibsondunn.com>>>

Date: Monday, March 1, 2021 at 11:53 AM

To: Robert ~Bunt <[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)<<mailto:rcbunt@pbatyler.com>>>, Tom Gorham <[tom@gillamsmithlaw.com](mailto:tom@gillamsmithlaw.com)<<mailto:tom@gillamsmithlaw.com>>>, Melissa ~Smith <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)<<mailto:melissa@gillamsmithlaw.com>>>, Jason Sheasby <[JSheasby@irell.com](mailto:JSheasby@irell.com)<<mailto:JSheasby@irell.com>>>

Cc: "~Winningham, Nicole"

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Subject: RE: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

Chris,

KAIFI did not even provide a copy of its second round of proposed amendments to its infringement contentions until February 19, after T-Mobile had already filed its motion to strike KAIFI's initial contentions. KAIFI now proposes to add even more additional theories that were not pleaded and not included by the contentions deadline, compounding the issues with KAIFI's original contentions. Moreover, the parties have not met and conferred on this second round of amendments, as required by Local Rule CV-7(h). A motion seeking leave for both sets of amendments is therefore not ripe, and T-Mobile would oppose such a motion on that basis among others.

We are available to meet and confer on KAIFI's second successive request.

Best regards,  
Paul J. Kremer  
(he / him / his)

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From: Chris Bunt <[rcbunt@pbatyler.com](mailto:rcbunt@pbatyler.com)<<mailto:rcbunt@pbatyler.com>>>  
Sent: Monday, March 1, 2021 11:44 AM  
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Subject: RE: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

[External Email]  
Counsel,

It's my understanding Tom and Melissa are in trial and may not see this email so I'm reaching out to all of TM's counsel. KAIFI is going to file our motion for leave for both first and second supplemental contentions today. It's my understanding that TM is opposed to both sets, but I am not certain I ever saw an email confirming opposition to the second set. I do know that TM said in its motion to strike that it did not think supplements were warranted. If there is some reason we need to discuss this, please call my cell today (903-539-5860), but I believe y'all have been clear about your opposition. Thanks.

CB

From: Chris Bunt

[<rcbunt@pbatyler.com<mailto:rcbunt@pbatyler.com<mailto:rcbunt@pbatyler.com%3cmmailto:rcbunt@pbatyler.com>>>](mailto:rcbunt@pbatyler.com)

Sent: Monday, February 22, 2021 3:59 PM

To: Melissa Smith

[<Melissa@gillamsmithlaw.com<mailto:Melissa@gillamsmithlaw.com<mailto:Melissa@gillamsmithlaw.com%3cmmailto:Melissa@gillamsmithlaw.com>>>](mailto:Melissa@gillamsmithlaw.com)

Subject: Re: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

I should have been clearer in my first email. We have now supplemented twice. We want to get approval for both of the amendments.

CB

Sent from my iPhone

From: Chris Bunt

[<rcbunt@pbatyler.com<mailto:rcbunt@pbatyler.com<mailto:rcbunt@pbatyler.com%3cmmailto:rcbunt@pbatyler.com>>>](mailto:rcbunt@pbatyler.com)

Sent: Monday, February 22, 2021 11:42 AM

To: Melissa Smith

[<Melissa@gillamsmithlaw.com<mailto:Melissa@gillamsmithlaw.com<mailto:Melissa@gillamsmithlaw.com%3cmmailto:Melissa@gillamsmithlaw.com>>>](mailto:Melissa@gillamsmithlaw.com)

Subject: FW: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

Melissa,

I gather from the recent email traffic and T-Mobile's motion to strike infringement contentions that it is opposed to a motion for leave by KAIFI to amend infringement contentions to include these that were sent out on Friday. Can you confirm whether that is the case and let me know if we need to have a quick call to comply with the meet and confer obligations? Obviously, I would prefer to have TM not object to a motion for leave, but if they are opposed, I need to tell my team so they can draft an opposed motion for leave to amend. Many thanks.

I hope you have power and water (and internet) again.

CB

From: Kelsey Atkinson

[<kelsey.atkinson@ltlattorneys.com<mailto:kelsey.atkinson@ltlattorneys.com<mailto:kelsey.atkinson@ltlattorneys.com>>>](mailto:kelsey.atkinson@ltlattorneys.com)

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Sent: Friday, February 19, 2021 8:48 PM

To: Curtis, Nathan R.

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[<rcbunt@pbatyler.com%3cmailto:rcbunt@pbatyler.com>>>](mailto:rcbunt@pbatyler.com%3cmailto:rcbunt@pbatyler.com); Deana Attaway  
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[<kelsey.atkinson@lattelorneys.com%3cmailto:kelsey.atkinson@lattelorneys.com>>>](mailto:kelsey.atkinson@lattelorneys.com%3cmailto:kelsey.atkinson@lattelorneys.com); Matthew Hawkinson  
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Subject: KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile

Counsel,

Please find attached KAIFI LLC's Second Supplemental Infringement Contentions under P.R. 3-1 to T-Mobile and document production pursuant to P.R. 3-2.

Best,

Kelsey Atkinson  
Associate

<image003.png>

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[www.ltlattorneys.com](http://www.ltlattorneys.com)<http://www.ltlattorneys.com>><https://protect-us.mimecast.com/s/vT0WCG69ADuBR5VriQ58q4/><https://protect-us.mimecast.com/s/PdALCNk8GNIZ83Z4u0h6Xw/>>

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